

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
UNITED STATES OF AMERICA, :

STIPULATION AND ORDER  
13 Cr. 560 (PGG)

- v. - :

INGRID LEDERHAAS-OKUN, :  
a/k/a "INGRID OKUN," :  
Defendant. :

- - - - - x

WHEREAS on or about July 26, 2013, INGRID LEDERHAAS-OKUN, a/k/a "Ingrid Okun," (the defendant) pled guilty to a one-count Information (the "Information") pursuant to a plea agreement with the Government (the "Plea Agreement");

WHEREAS on or about July 29, 2013, the Court entered a Consent Preliminary Order of Forfeiture/Money Judgment (the "Consent Order"), which included a Money Judgment against the defendant in the amount of \$2,114,873 (the "Money Judgment"), pursuant to the defendant's Plea Agreement;

WHEREAS, pursuant to Title 21, United States Code, Section 853(p), the Government is entitled to forfeit other property of the defendant up to the amount of the Money Judgment;

WHEREAS the defendant and her husband, Robert A. Okun ("Okun"), are the owners of the real property located at 1 Timber Lane, Darien, CT 06820 (the "Property");

WHEREAS, the Government anticipates seeking to forfeit the defendant's interest in Property pursuant to Title 21, United States Code, Section 853(p);

WHEREAS, there is currently a dispute between Okun and the United States regarding the extent of the respective interests of the defendant and Okun in the Property;

WHEREAS, the defendant and Okun are currently seeking to sell the Property;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Preet Bharara, United States Attorney, Assistant United States Attorneys Rosemary Nidiry and Alexander J. Wilson, of counsel, and Robert A. Okun, and his counsel, Bernard Kleinman, Esq., that:

1. Robert A. Okun ("Okun") will make his best efforts to sell the Property within nine months from the date of entry of this Stipulation and Order.

2. The United States will not file a *lis pendens* or seek a substitute asset order with respect to the Property, or otherwise encumber it, for nine months from the date of entry of this Stipulation and Order.

3. Okun will provide any proposed contract for the sale of the Property to the United States Attorney's Office for the Southern District of New York ("USAO-SDNY"), and shall not enter into any such contract without the prior written approval

of the USAO-SDNY. The USAO-SDNY will not unreasonably withhold its approval of any offered arms-length contract for sale to a third party purchaser.

4. If the Property is sold before the extent of Okun's interest in the Property is determined by agreement of the parties or further order of the Court, the proceeds of the sale shall be deposited in an escrow account maintained by Bernard Kleinman, Esq. pending such a determination of Okun's interest.

5. Okun waives all rights to appeal this Stipulation and Order, or to otherwise challenge or contest its validity.

6. Each party shall bear its own costs and attorney's fees.

7. This Stipulation and Order may be executed in counterparts, each of which shall constitute an original as against the party whose signature appears on it. All executed counterparts shall be deemed to be one and the same instrument. This Stipulation and Order shall become binding when one or more counterparts, individually or taken together, bears the signature of all parties. A facsimile or electronic image of the original signature of any party executing this Stipulation and Order shall be deemed an original signature and shall

constitute an original as against the party whose signature  
appears in the facsimile or electronic image.

Dated: New York, New York  
December \_\_, 2013

AGREED AND CONSENTED TO:

PREET BHARARA  
United States Attorney for the  
Southern District of New York  
Attorney for the United States

By: 

ROSEMARY NIDIRY  
ALEXANDER J. WILSON  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-1063/2453

12/19/2013  
DATE

ROBERT A. OKUN

By: 

ROBERT A. OKUN

12/17/2013  
DATE

By: 

BERNARD KLEINMAN, ESQ.

12/12/2013  
DATE

So Ordered:

HONORABLE PAUL G. GARDEPHE  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK